

# Exhibit 3

to Eduard Slinin's Opposition to  
Alex Shnaider's Motions in Limine

1

2 IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----x  
EDWARD SLININ,

4

Plaintiff,

5

Civil Action No.

6 -against-

1:15-cv-09674 (RJS)

7

ALEX SHNAIDER,

8

Defendant.

9

-----x

10

September 15, 2017

11

9:08 a.m.

12

13

14 Deposition of ALEX SHNAIDER, taken by  
15 Plaintiff, pursuant to Notice, at the  
16 offices of Boies, Shiller & Flexner, LLP,  
17 575 Lexington Avenue, New York, New York,  
18 before Jowell Falsetta, a certified  
19 Shorthand Reporter and Notary Public  
20 within and for the State of New York.

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Page 2	Page 4
1                   APPEARANCES:	1                   ALEX SHNAIDER
2	2                   ALEX SHNAIDER,
3	3                   14600 Westin Road, King City, Ontario
4	4                   17B1K4, being first duly sworn by Jowell
5	5                   Falsetta, a Notary Public of the State of
6	6                   New York, was examined and testified as
7	7                   follows:
8	8                   EXAMINATION BY MR. LEBOWITZ:
9	9                   Q.     Good morning, Mr. Shnaider.
10	10                  A.     Good morning.
11	11                  Q.     My name is Larry Lebowitz.
12	12                  I know we were introduced in the hall
13	13                  by Ms. Dyer. I am the attorney for
14	14                  Mr. Slinin.
15	15                  To my right is Ethan Gerber, who
16	16                  is co-counsel in this case. To his
17	17                  left is Mr. Slinin and to Mr. Slinin's
18	18                  left is Olga Aleinik, who is also
19	19                  associated with Mr. Gerber's firm.
20	20                  Ms. Dyer to your right is your
21	21                  attorney; right?
22	22                  A.     Correct.
23	23                  Q.     I am here today to ask you
24	24                  certain questions regarding the case
25	25                  that Mr. Slinin has brought against
1	1                   ALEX SHNAIDER
2                   STIPULATIONS:	2                   you. And during the course of the
3	3                   deposition as we go forward, if I ask
4	4                   you a question, which you do not
5	5                   understand, please let me know and I'll
6	6                   repeat the question.
7	7                   A couple of other rules, if you
8	8                   want to take a break at any time, let
9	9                   me know. I will be happy to
10	10                  accommodate you. However if there is
11	11                  an open question, I will ask that you
12	12                  answer it before we take a break.
13	13                  Same thing with respect to
14	14                  speaking with your attorney, if you
15	15                  wish to take a break to consult with
16	16                  her, no problem, let me know.
17	17                  Again the only caveat, if there
18	18                  is an open question, I ask you to
19	19                  complete the answer before we take a
20	20                  break. Have you understood everything
21	21                  I have said?
22	22                  A.     Yes.
23	23                  Q.     Do you speak and understand
24	24                  English fluently?
25	25                  A.     Yes.

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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	Do you know if Mr. Slinin gave a	2	had to come to Russia to give a
3	statement to the Russian authorities?	3	statement and the statement was already
4	A. I believe he did but I don't	4	prearranged basically.
5	recall the time or when it was done.		
6	Q. Okay.	5	Q. But so while you were in
7	Did there come a time when you	6	Russia -- did you in fact go to Russia
8	were asked to give a statement to the	7	to make that statement?
9	Russian authorities?	8	A. Yes, I went for like a few
10	A. Yes.	9	days.
11	Q. Did you voluntarily go to	10	Q. Did you give a statement to
12	Russia to make such a statement?	11	the Russian authorities under oath?
13	A. Yes, I was asked by	12	A. I gave the statement
14	Mr. Slinin and the lawyers at the time	13	whatever they asked me to do in order
15	to go to Russia because it was already	14	to close the case and I did it.
16	basically the end of the investigation.	15	MR. LEBOWITZ: Karen, I
17	Apparently everything was already lined	16	produced this to you and I
18	up that the investigation will end	17	thought I had other copies but I
19	because we provided all of the	18	don't.
20	contracts from Bombardier,	19	MS. DYER: I have multiple
21	confirmations from Bombardier, that the	20	copies.
22	deposits were paid. The deposits were	21	MR. LEBOWITZ: Do you have
23	non refundable, that the contracts and	22	other copies because I'll mark
24	the planes were available. Everything	23	this?
25	was as per the contract. So there is	24	MS. DYER: 000439 through
		25	443?
1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	no reason to have these investigations.	2	MR. LEBOWITZ: Right.
3	When we provided everything, I	3	MS. DYER: I have a clean
4	was told that it is, the case will not	4	copy that you can mark.
5	close unless I come to Moscow and give	5	MR. LEBOWITZ: Shnaider 1,
6	a statement that was already basically	6	please.
7	prearranged by the lawyers and	7	(Statement marked for
8	investigators and thereby the case will	8	identification, Shnaider Exhibit
9	be closed.	9	1.)
10	Q. Okay.	10	Q. Mr. Shnaider, I am going to
11	When you say "prearranged", you	11	ask you to take a look at the document
12	mean that -- well what exactly do you	12	that has been marked as Shnaider
13	mean when you say was prearranged, that	13	Exhibit 1. I'm going to ask you to
14	the meeting was scheduled for you to go	14	read it carefully and then I'm going to
15	there?	15	ask you questions about it. So please
16	A. Yes, that it was scheduled	16	take your time and please read it.
17	for me to come in and that it was all	17	A. Do you have a signed
18	arranged that it will be closed. That	18	document?
19	investigators basically subject to my	19	Q. This is what I have.
20	arrival and possibly Mr. Slinin's	20	A. But this is not a signed
21	arrival and I don't recall whether	21	document.
22	Robert Lee arrived or George Rependa	22	Q. If I had a document that was
23	also had to come.	23	signed, I would give it to you but this
24	All of the people that were	24	is the exhibit that I have.
25	involved were as far as I could recall,	25	A. Okay so, my name is spelled

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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	wrong, my address is wrong.	2	the form.
3	MS. DYER: Go ahead and	3	A. Yes, I was.
4	read it. Take whatever time you	4	Q. What was that attorney's
5	need to review it and then	5	name?
6	Mr. Lebowitz will ask you	6	A. Igor Kopende.
7	whatever questions he wants. And	7	Q. Is that an attorney that you
8	you could note those things but	8	retained?
9	wait for -- I don't think there	9	A. Yes. I retained that
10	is a pending question.	10	attorney. He represented both of
11	Q. I would like you to read it	11	myself and Mr. Slinin as far as I
12	and then we will go through it.	12	remember.
13	A. Can I ask something?	13	Q. So let's go through what I
14	Q. Ask Ms. Dyer. You cannot	14	have marked here and see if we could do
15	ask me.	15	this with some dispatch.
16	MS. DYER: Let's wait for	16	On the first page, in the
17	the question. That is okay, just	17	statement that you gave, were you
18	read it and wait for the	18	questioned by a member of the Moscow
19	question.	19	police?
20	MR. LEBOWITZ: Let's take	20	A. I don't remember who was
21	a break while he reads that.	21	questioning me.
22	(A recess was taken.)	22	Q. But you were questioned by
23	Q. Mr. Shnaider, have you had	23	some Russian individual?
24	the opportunity to review the document	24	A. I was questioned by, yes,
25	that was marked as Exhibit 1?	25	some Russian individual and that is
	Page 127		Page 129
1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	A. Yes.	2	correct.
3	Q. Do you recognize what that	3	Q. Who did you understand that
4	is?	4	person to be?
5	A. I don't recognize this	5	A. An investigator. I don't
6	document, no.	6	know if he was working for the Russian
7	Q. Did you make a statement to	7	police or --
8	the Russian authorities in respect to	8	Q. Let's start with the first
9	the criminal investigation that you	9	page, is your date of birth correct on
10	testified about earlier this morning?	10	that first page?
11	A. I recall that I did.	11	MS. DYER: Objection to
12	Q. And do you recall whether	12	the form.
13	you made that statement in Moscow?	13	Q. Do you see where it says
14	A. Yes, I did.	14	date of birth under item two?
15	Q. And do you recall whether	15	A. My date of birth, the year
16	you made it in May of 2009?	16	of birth, there is no date, the year of
17	A. No, I don't.	17	birth is correct.
18	Q. Do you recall when you did	18	Q. Okay.
19	make that statement?	19	A. And my name is spelled
20	A. No, I don't recall whether I	20	wrong. My kids' names are spelled
21	made that statement.	21	wrong.
22	Q. Were you represented by an	22	Q. We will go through each
23	attorney in Moscow during the course of	23	item.
24	the statements that you made?	24	With respect to item three,
25	MS. DYER: Objection to	25	place of birth, were you born in

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1	ALEX SHNAIDER	ALEX SHNAIDER
2	Lindgren?	finished?
3	A. Yes.	Q. Are you finished?
4	Q. Now called St. Petersburg;	A. Yes, I was advised I have
5	correct?	certain rights. I don't know if these
6	A. Correct.	are the ones.
7	Q. And in May of 2009 did you	Q. And was your attorney
8	live at 81 Old Colony Road in Toronto?	Mr. Kopende present the entire time you
9	A. I lived on 91 Old Colony	were questioned by the Moscow
10	Road.	authorities?
11	Q. And in 2009 were you	A. I would assume so but I
12	married?	don't recall exactly. I don't recall
13	A. Yes, I was.	this particular interrogation or how
14	Q. And did you have three	exactly it took place, who was in the
15	children?	room.
16	A. Yes, I did.	Q. Have you ever been subject
17	Q. Can you tell me were their	to a criminal investigation other than
18	names Jennifer, Erica and Rebecca?	this one?
19	A. Jennifer, Erica and Rebecca	MS. DYER: Objection to
20	which was born in 2004, not in 2005.	the form.
21	Q. With respect to line 11, is	A. No.
22	the information regarding your Canadian	Q. I would imagine that it was
23	passport correct?	somewhat of a significant event.
24	A. I am not sure. I don't have	MS. DYER: Objection to
25	this passport.	the form.
	Page 131	Page 133
1	ALEX SHNAIDER	ALEX SHNAIDER
2	Q. Did you have a Canadian	A. When it started it was a
3	passport in 2009?	significant event but it was not a
4	A. Yes.	significant event already when I went
5	Q. Did you present it to the	to Russia because it was supposed to be
6	authorities for them to view?	finished.
7	A. I don't recall.	Q. Are you familiar with the
8	Q. Do you see in the second,	expression something is ProForma?
9	the lower half, the first page it	Do you know what that means?
10	indicates or makes a statement that you	A. No.
11	were given certain rights with respect	Q. Let's move on. Let's start
12	to your, the questions that you were	on the first page or well let's, it
13	going to be asked.	would be the second page. So page that
14	Do you see that?	ends at the bottom with 440.
15	MS. DYER: Objection to	A. Uh-huh.
16	the form.	Q. Were you asked a question
17	A. Yes, I see what is written.	about whether or not you knew an
18	Q. Were you in fact advised	individual named Kiral Dumov, do you
19	that you had certain rights with	see that on fourth line down or fourth
20	respect to this statement you were	paragraph down?
21	going to give?	A. Yes, I see it.
22	A. Yes, I was advised that I	Q. Is as you sit here today do
23	have certain rights.	you know who Mr. Dumov is?
24	Q. Was your --	A. No, I don't.
25	MS. DYER: Wait, were you	Q. Do you know somebody named

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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	Vitali Kachur?	2	MR. LEBOWITZ: That is
3	A. I remember meeting somebody	3	correct.
4	that wanted to, that Eddie Slinin sent	4	A. So what was the question if
5	to meet me that wanted to buy one of my	5	I -- I don't know Mr. Perumov.
6	watches. So I would imagine that that	6	Q. I understand.
7	is him but I wouldn't even remember	7	A. So --
8	what he looks like or who he is and how	8	Q. As you sit here today you
9	he fits into this case.	9	have no recollection of having spoken
10	Q. Okay. I am going to go down	10	with him?
11	paragraph by paragraph here and ask you	11	A. No, I don't have any
12	if what is stated in the paragraph is	12	recollection. I remember somebody
13	accurate or if you have some	13	called me but I don't know if this is
14	disagreement with what is stated.	14	Mr. Perumov or Mr. Perumov's friend or
15	A. Right.	15	Mr. Perumov's employee. I don't know
16	Q. So let's go to the next	16	who called me.
17	paragraph regarding Mr. Perumov.	17	Q. Let's go to the next
18	Is there anything in that	18	paragraph, which begins for several
19	paragraph that you think is inaccurate?	19	years and I'll ask you to tell me if
20	MS. DYER: Where --	20	there is anything that is inaccurate in
21	MR. LEBOWITZ: That begins	21	that paragraph?
22	"I don't know George Perumov."	22	A. Seems like it.
23	MS. DYER: On P000440?	23	Q. And the next paragraph,
24	MR. LEBOWITZ: Yes.	24	which is "E. Slinin reached out to me"?
25	A. It is correct that I don't	25	A. I don't know if this is the
	Page 135		Page 137
1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	know him personally. I don't recall	2	date, could have been one of the phone
3	speaking to him on the phone.	3	conversations that we had with
4	Q. Is there any reason as you	4	Mr. Slinin.
5	sit here today to believe that the	5	Q. Other than the date here
6	statement that you made in 2009 about	6	spring of 2007, is it otherwise an
7	speaking with him during the summer of	7	accurate statement?
8	2008 would be inaccurate?	8	A. Not really because he knew
9	MS. DYER: Objection to	9	that I worked with Bombardier. He
10	the form.	10	would not ask me if I worked with
11	Q. You could answer.	11	Bombardier. He knew I was working with
12	MS. DYER: This is not a	12	Bombardier, so it is not.
13	signed statement. Do you have a	13	MS. DYER: Is there a
14	signed statement, sir?	14	correction, I either need to hear
15	MR. LEBOWITZ: I don't but	15	the question back so I could
16	I am asking him if --	16	listen to it or it needs to be
17	MS. DYER: You are	17	restated, one or the other.
18	presenting to him a draft	18	Q. Yes. Can you tell me again
19	statement. Is your question	19	in that paragraph what is it that you
20	whether this draft statement --	20	believe is inaccurate?
21	MR. LEBOWITZ: My question	21	A. I communicated with
22	is by reading this --	22	Mr. Slinin quite often. So he wouldn't
23	MS. DYER: Is this	23	call me and ask me if I work, if I
24	accurate as far as he recalls, as	24	still work with Bombardier. If I have
25	far as the chronology?	25	a connection with Bombardier, he knew I

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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	had a connection with Bombardier. It	2	really works. There is a question if
3	wasn't in this form that he called me.	3	there is really a buyer that has the
4	I don't know if this is the date and I	4	funds and at what price he wants to buy
5	don't know if this is how our	5	it and not how the contracts really
6	conversations started with Mr. Slinin.	6	work.
7	Again this was written by, I	7	Q. How about the next paragraph
8	don't know who wrote it. I don't know	8	which is, "Later I explained to Slinin
9	if it is translated correctly from	9	the scheme for the purchase of the
10	Russian and this statement was	10	aircraft"?
11	prearranged.	11	A. Seems correct until the last
12	Q. That is fine. That is why	12	sentence that "Slinin told me that
13	I'm going through with you paragraph by	13	everything would be fine as he reached
14	paragraph and asking you if there are	14	a verbal agreement to accumulate
15	inaccuracies, for you to tell me what	15	Perumov's money in the amount
16	is inaccurate.	16	sufficient to pay the first payment on
17	Let's go to the next paragraph	17	the contract on his account in
18	later in late spring.	18	Switzerland."
19	A. What is the question, if we	19	That I don't know whose account
20	met in New York?	20	in Switzerland, which money, how much
21	Q. I am asking you is that	21	money, I mean.
22	statement accurate, right?	22	Q. What about the next
23	A. I don't know if the date is	23	paragraph which is the last paragraph
24	accurate. I don't recall this. I	24	or partial paragraph on that page, that
25	don't recall any of this. Acquiring	25	begins "some time later"?
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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	more Bombardier aircraft. I don't know	2	A. I don't know if this is the
3	where this more is coming from. I	3	date but seems correct.
4	don't know if we actually met in New	4	Q. Let's turn now to the next
5	York and discussed this.	5	page, which is a page that ends with
6	Q. Okay.	6	the three digits 441. And I'll ask you
7	How about the next paragraph	7	to start with the first full paragraph
8	which says, "I do remember then at that	8	on that page that begins, "As it was
9	time."	9	agreed between me and Slinin."
10	A. The 30 million mark is	10	And read that paragraph and tell
11	correct. The difference between the	11	me if you agree with what is stated
12	three and five million, that I don't	12	there?
13	know if it is correct.	13	A. There is a number of things
14	Q. Okay.	14	that I cannot comment at this time.
15	How about the income paragraph	15	For example those are all the companies
16	where it begins "I explained to E.	16	that were used for Perumov's contracts,
17	Slinin"?	17	seem to be but I don't know because I
18	A. I don't think that this is	18	don't know the names of these
19	correct because he would not ask me to	19	companies. Blue Industrial Skies, I
20	find out more diligently about	20	mean I remember that company but I
21	anything. We were so far from any	21	don't remember the other one.
22	contract at that point, that there is	22	Q. Okay.
23	no, there is nothing to find out	23	A. I don't know if this is the
24	diligently.	24	share holding 70, 30 between Perumov
25	Nothing turned around how it	25	and Mr. Slinin. And for sure that

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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	Mr. Slinin did not acquire any share of	2	Q. Who would have known that?
3	Challenger Aircraft Company or CL 850.	3	A. Probably must have documents
4	It was 100 percent acquired by me. It	4	to show how the funds flowed. I don't
5	could have been asked by the lawyer to	5	have that.
6	put Mr. Slinin somehow involved into	6	Q. But was it Mr. Lee who kept
7	here in order to basically get, you	7	track of these transactions for you?
8	know, get them out from this	8	MS. DYER: Objection to
9	investigation also I'm not sure.	9	the form.
10	Q. Okay.	10	A. Mr. Lee, yes, he tracked it.
11	How about the next paragraph,	11	Q. What about the next
12	regarding the purchase of the XRS?	12	paragraph it begins "As far as I know
13	A. Does not seem right because	13	Slinin and Perumov met in January of
14	the paragraph before already has five	14	2008"?
15	offshore companies. So that should	15	A. I don't recall that at all.
16	have included the XRS. So why would we	16	Q. Then the next paragraph "As
17	have five offshore companies and five	17	per Slinin, it started in spring of
18	planes. So it does not seem right.	18	2008"?
19	Q. Next paragraph which begins	19	A. I don't know. There are too
20	in late autumn.	20	many details that I don't remember how
21	A. Again all these dates, I am	21	it took place.
22	not sure about.	22	Q. Let me ask you this in the
23	Q. What about the substance of	23	context of that paragraph, would it
24	the paragraph?	24	have been possible for you to assign
25	A. I don't know. I don't know.	25	the CAC or CL 850 between that company
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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	Seems correct but I don't know these	2	and Bombardier to Perumov or a Perumov
3	dates. I don't know how the money	3	SPV?
4	flowed. It says here that Mr. Slinin	4	MS. DYER: Objection to
5	accumulated the money in his company.	5	the form.
6	So I'm not sure if this is correct or	6	Q. I am asking you
7	not. I don't know.	7	independently of --
8	Q. Okay, let's go to the next	8	MS. DYER: Hold on, hold
9	paragraph which says "Robert Lee	9	on.
10	reported to me."	10	Q. -- of the statement, it
11	A. I don't know. I don't know	11	makes certain references to assigning
12	if this is correct or not. Seems	12	the contract. So I'm asking you what
13	reasonable but I don't know how correct	13	is your understanding of whether or not
14	it is.	14	you could have assigned any of the,
15	MS. DYER: Don't	15	whether they were CL 850 or CAC
16	speculate.	16	contracts with Bombardier directly to
17	Q. Would it be correct that	17	Perumov or one of his SPVs?
18	Robert Lee reported to you?	18	MS. DYER: Objection to
19	A. Yes.	19	the form.
20	Q. Okay.	20	A. Theoretically, the intention
21	Let's go to the next paragraph,	21	was to assign the contracts but I just
22	"Funds sufficient to make the first	22	am not sure at which period of time and
23	payment".	23	when these contracts are assigned.
24	A. I don't know what was the	24	After how much money is received before
25	flow of funds and the amounts.	25	these contracts are assigned. That is

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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	the -- they are supposed to be assigned	2	MS. DYER: And the
3	once the entirety of the deposit or the	3	question is?
4	entirety of profit on these contracts	4	MR. LEBOWITZ: Let him
5	have been transferred. At that time	5	look at that paragraph and tell
6	probably you have no more risk but to	6	me if there is anything stated
7	assign the contract.	7	there that he disagrees with,
8	Q. And so would Bombardier's	8	same question.
9	permission have to have been obtained	9	A. I don't know what this is.
10	in order to assign the contract?	10	Q. Okay.
11	A. Yes, I believe you would	11	What about the next paragraph
12	need Bombardier's permission. I am not	12	"At the urging of Perumov on August 18,
13	sure how it works. I was not involved	13	2008, et cetera."
14	in it.	14	A. Okay, again I don't know if
15	Q. And so if I understood your	15	this took place.
16	last answer, once the premium in the	16	Q. Okay.
17	purchase price had been received by you	17	What about the next paragraph
18	and Mr. Slinin, at that point you would	18	that begins "thus on August 18, 2008"?
19	assign the contract between CL 850 or	19	A. I don't know if this is, the
20	CAC and Bombardier to the contracting	20	dates are correct. I don't recall
21	party that was the SPV?	21	this. I wasn't involved in this.
22	MS. DYER: Objection to	22	Q. What about the next
23	the form.	23	paragraph that begins "as far as I
24	A. Again, I'm not clear at what	24	know"?
25	point but as soon as I would have no	25	A. Same.
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1	ALEX SHNAIDER	1	ALEX SHNAIDER
2	more liability and I would have all of	2	Q. And finally the last
3	the profits paid to me, I would	3	paragraph "They're implementing these"?
4	probably agree to assign the contract.	4	A. That seems correct because I
5	Q. When you say all the profits	5	know that Blue Industrial Skies at the
6	paid to you, you mean your share of the	6	end was Mr. Slinin's company.
7	profits?	7	Q. Do you recall when you were
8	A. Yes, my share of the	8	in Russia, were you asked to actually
9	profits.	9	sign a statement?
10	MS. DYER: Objection to	10	A. I don't recall. I don't
11	the form.	11	recall. I believe so but I don't
12	Q. Let's go back to the	12	recall.
13	agreement, please. I think we are up	13	MR. LEBOWITZ: Maybe this
14	to the last two lines of page 441.	14	is a good time for us to take a
15	A. Which agreement are you	15	lunch break since it's 1:15.
16	talking about?	16	(A recess was taken.)
17	Q. Your statement, I am sorry.	17	Q. Good afternoon, Mr.
18	It begins "I think in August of 2008	18	Shnaider. Let us continue, same rules
19	the three-party agreement," et cetera,	19	apply, okay.
20	et cetera and it carries over on to the	20	A. Yes.
21	next page.	21	Q. Did there come a time in
22	A. So it started in spring	22	respect to the contracts that related
23	or --	23	to Mr. Perumov, that Mr. Shnaider told
24	Q. The last two lines I think	24	you --
25	in August of 2008.	25	A. Mr. Shnaider?

	Page 202	Page 204
1	ALEX SHNAIDER	ALEX SHNAIDER
2	MR. LEBOWITZ: I ask that	MR. LEBOWITZ: I have no
3	we mark this document as Shnaider	further questions. We are done.
4	2.	(TIME NOTED: 3:04 p.m.)
5	(E-mail marked for	
6	identification, Shnaider Exhibit	
7	2.)	
8	Q. Mr. Shnaider, if you would	
9	look at the copy that has been marked.	
10	I ask that you take a look at that and	
11	I have a couple of questions for you.	
12	A. Okay, do I need to read it?	
13	MS. DYER: Only if you	
14	feel you need to.	
15	Q. I'm only going to ask you a	
16	question or two and it is not about the	
17	content. I am going to ask you if you	
18	have a recollection of getting this	
19	document which appears to be an e-mail	
20	from Rob Lee to you, with a copy to	
21	George Rependa, dated April 11, 2011.	
22	A. No, I don't remember this.	
23	Q. Do you remember this was Mr.	
24	Lee's e-mail address back in 2011, do	
25	you know?	
	Page 203	Page 205
1	ALEX SHNAIDER	
2	A. Yes, it is from Rob Lee and	C E R T I F I C A T E
3	it is dated, yes.	STATE OF NEW YORK :)
4	Q. And it is addressed to you	: ss.
5	at the correct e-mail address; correct?	COUNTY OF NEW YORK :)
6	A. I don't know. It doesn't	
7	say the e-mail address.	7. JOWELL FALSETTA, a Shorthand
8	Q. Do you recognize George	Reporter and Notary Public within and for
9	Rependa's name on the cc?	the State of New York, do hereby certify:
10	A. Yes.	10. That ALEX SHNAIDER, the witness
11	Q. Do you know whether or not	11. whose deposition is hereinbefore set
12	that is his e-mail address?	12. forth, was duly sworn by me and that such
13	A. Seems like his e-mail	13. deposition is a true record of the
14	address, yes.	14. testimony given by the witness.
15	Q. I'm only interested in the	15. I further certify that I am not
16	first small paragraph, which says, "I	16. related to any of the parties to this
17	attach a copy below the questions for	17. action by blood or marriage, and that I am
18	BBD and my suggested answers in italics	18. in no way interested in the outcome of
19	below each one."	19. this matter.
20	Do you know what the initials	20. IN WITNESS WHEREOF, I have hereunto
21	BBD stand for there?	21. set my hand this 28th day of September,
22	A. Bombardier.	22. 2017.
23	Q. Okay.	<i>Jowell Falsetta</i> JOWELL FALSETTA
24		
25		

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1  
2           I N D E X  
3

4     EXHIBITS                                   PAGE  
5     Statement marked for                   125  
6     identification, Shnaider Exhibit 1  
7     E-mail marked for identification,   202  
8     Shnaider Exhibit 2  
9     \*\*\*EXHIBITS RETAINED BY COURT REPORTER \*\*\*  
10  
11  
12   Signature line and jurat..... page 204  
13  
14   Examination by  
15   Mr. Lebowitz, pages 4-204  
16  
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1     STATE OF NEW YORK )  
2   ss:  
3     COUNTY OF NEW YORK      )  
4     I wish to make the following changes,  
5     for the following reasons:  
6     PAGE LINE    \_\_\_\_\_  
7       CHANGE FROM: \_\_\_\_\_  
8       CHANGE TO:   \_\_\_\_\_  
9     REASON:  
10    \_\_\_\_\_  
11    CHANGE FROM: \_\_\_\_\_  
12    CHANGE TO:    \_\_\_\_\_  
13    REASON:  
14    \_\_\_\_\_  
15    CHANGE FROM: \_\_\_\_\_  
16    CHANGE TO:    \_\_\_\_\_  
17    REASON:  
18    \_\_\_\_\_  
19    CHANGE FROM: \_\_\_\_\_  
20    CHANGE TO:    \_\_\_\_\_  
21    REASON:  
22  
23   Subscribed and sworn to before me  
24   this \_\_\_\_ day of \_\_\_\_\_, 2017.  
25